

Matthew J. Oppenheim (*pro hac vice*)
 Corey Miller (*pro hac vice*)
 Danae Tinelli (*pro hac vice*)
 OPPENHEIM + ZEBRAK, LLP
 4530 Wisconsin Avenue NW, 5th Floor
 Washington, DC 20016
 Telephone: (202) 480-2999
 matt@oandzlaw.com
 corey@oandzlaw.com
 danae@oandzlaw.com

Noel M. Cook, SBN 122777
 HANSON BRIDGETT LLP
 425 Market Street, 26th Floor
 San Francisco, California 94105
 Telephone: (415) 777-3200
 Facsimile: (415) 541-9366
 ncook@hansonbridgett.com

Jacob L. Tracer (*pro hac vice*)
 RECORDING INDUSTRY ASSOCIATION
 OF AMERICA
 1000 F St. NW, 2nd Floor
 Washington, DC 20004-1512
 Telephone: (202) 857-9611
 jtracer@riaa.com

Attorneys for Plaintiffs UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
 RECORDS, LLC, CONCORD BICYCLE
 ASSETS, LLC, CMGI RECORDED MUSIC
 ASSETS LLC, SONY MUSIC
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER
 KAHLE, KAHLE/AUSTIN FOUNDATION,
 GEORGE BLOOD, and GEORGE BLOOD,
 L.P.

Defendant(s).

) Case No.: 3:23-cv-06522-MMC

) **Stipulation and Proposed Order to Stay the**
) **Case for Thirty Days**

Pursuant to Civil Local Rule 6-1(b) and Section 7 of the Court's Standing Orders, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music ("collectively, "Plaintiffs") and Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, and George Blood LP (collectively, "Defendants") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), hereby stipulate as follows:

WHEREAS, Plaintiffs noticed their Motion for Leave to File the Second Amended Complaint ("Motion") for hearing on April 11, 2025, ECF No. 159;

WHEREAS, the Parties have engaged in and made significant progress in settlement discussions and believe a thirty (30) day stay of proceedings will facilitate resolution of this matter;

WHEREAS, the Parties are optimistic that settlement discussions may be successful and that this case can be dismissed;

WHEREAS, in the event that settlement discussions do not result in a resolution, the Parties agree to confer and submit a proposed schedule to the Court to reset case deadlines;

NOW, THEREFORE, the Parties hereby stipulate and respectfully request the Court to order as follows:

1. The hearing on Plaintiffs' Motion noticed for April 11, 2025 is VACATED.
2. This case shall be stayed for thirty (30) days from the date of entry of this Order to allow the Parties to continue their settlement discussions.
3. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
4. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

IT IS SO STIPULATED.

1 Dated: April 4, 2025

2 /s/ Matthew J. Oppenheim

3 Matthew J. Oppenheim (*pro hac vice*)

4 Corey Miller (*pro hac vice*)

5 Danae Tinelli (*pro hac vice*)

6 OPPENHEIM + ZEBRAK LLP

7 4530 Wisconsin Avenue NW, 5th Floor

8 Washington, DC 20016

9 Telephone: (202) 480-2999

10 matt@oandzlaw.com

11 danae@oandzlaw.com

12 corey@oandzlaw.com

13 Noel M. Cook, SBN 122777

14 HANSON BRIDGETT LLP

15 425 Market Street, 26th Floor

16 San Francisco, California 94105

17 Telephone: (415) 777-3200

18 Facsimile: (415) 541-9366

19 ncook@hansonbridgett.com

20 Jacob L. Tracer (*pro hac vice*)

21 RECORDING INDUSTRY ASSOCIATION

22 OF AMERICA

23 1000 F St. NW, 2nd Floor

24 Washington, DC 20004-1512

25 Telephone: (202) 857-9611

26 jtracer@riaa.com

27 ***Attorneys for Plaintiffs UMG Recordings, Inc.;***

28 ***Capital Records, LLC; Concord Bicycle Assets,***

LLC; CMGI Recorded Music Assets LLC; Sony

Music Entertainment; and Arista Music

/s/ Andrew M. Gass

Andrew M. Gass (Bar No. 259694)

andrew.gass@lw.com

Joseph R. Wetzel (Bar No. 238008)

joe.wetzel@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

(415) 391-0600

Allison L. Stillman (*pro hac vice*)

alli.stillman@lw.com

1271 Avenue of the Americas

New York, NY 10020

(212) 906-1200

Brent Murphy (*pro hac vice*)

brent.murphy@lw.com

555 Eleventh Street NW, Suite 1000

Washington, DC 20004

(202) 637-2201

***Attorneys for Defendants Internet Archive,
Brewster Kahle, Kahle/Austin Foundation,
George Blood, and George Blood L.P.***

SIGNATURE ATTESTATION

Pursuant to Civ. L.R. 5.1, I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered for inspection upon request.

Dated: April 4, 2025

OPPENHEIM + ZEBRAK, LLP

/s/Matthew J. Oppenheim

Matthew J. Oppenheim

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
RECORDS, LLC, CONCORD BICYCLE
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GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

[Proposed] Order to Stay Case for Thirty Days

The Court, having considered the Parties' Stipulation to Stay the Case for Thirty Days, and good cause having been shown, hereby orders as follows:

1. The hearing on Plaintiffs' Motion noticed for April 11, 2025 is VACATED.
2. This case shall be stayed for thirty (30) days from the date of entry of this Order to allow the Parties to continue their settlement discussions.
3. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
4. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

IT IS SO ORDERED.

Dated: _____

MAXINE M. CHESNEY
United States District Judge